



Statewide Maltreatment in Care Remediation Plan

Purpose: This plan outlines the Michigan Department of Health and Human Services' efforts to improve the safety of children under the supervision and care of the Department.

Maltreatment in Care Overview

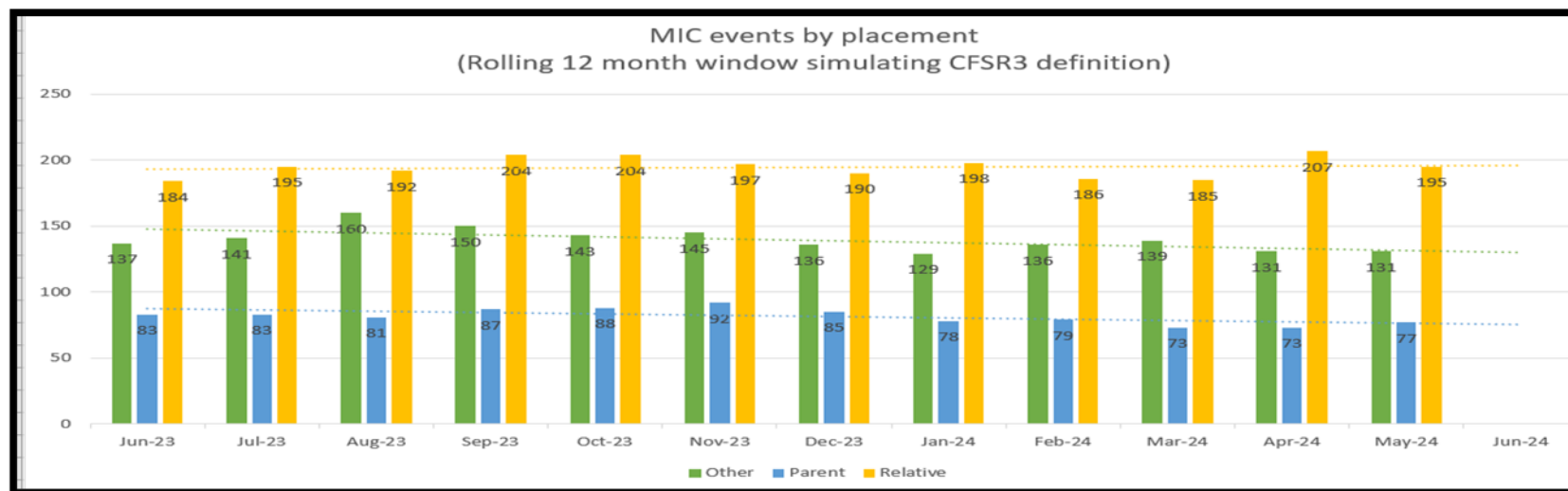
Children's Protective Services Maltreatment in Care (CPS-MIC) units are responsible for investigating assigned referrals of child abuse and/or neglect involving the following:

- All detention centers, including all county and court operated facilities, youth homes, shelter homes, residential care facilities, and halfway houses.
- Parental homes when foster care is an active program, so long as the child spent one or more days in out-of-home placement since the most recent open date for the foster care program.
- Licensed foster care homes, unlicensed relative foster homes, and group homes.
- Licensed childcare homes (e.g., day cares), licensed group homes or facilities.
- Licensed Children's camps.
- Referrals involving refugee children placed in licensed foster homes. These are MIC investigations even if the refugee children are not wards of the court.

Currently, unlicensed relative placements have the highest MIC confirmation rates (see chart below). While there are other living arrangements that contribute to MIC rates, initially focusing on a robust plan to address child abuse/neglect in relative placements will allow for substantial reduction in our statewide MIC rate.



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Placement Collaboration Unit

The Placement Collaboration Unit (PCU) launched in 2019 to ensure all allegations and potential safety concerns on active foster care cases are identified and addressed appropriately by staff. PCU staff collaborate with assigned foster care workers and others involved in a child's case to identify safety risks, promote policy compliance, and develop effective safety plans, whenever necessary. As of October 2023, 61 percent of cases with MIC confirmations had prior involvement with the PCU. This presents an opportunity to address safety concerns prior to a subsequent MIC event. A review of PCU goals and compliance metrics will occur as part of this plan. Additionally, discussions regarding implementation of follow-up actions recommended by the PCU, as well as a tracking process to ensure required actions are completed will take place. Further exploration will occur to determine if there are alternate case actions the PCU team could complete to reduce MIC incidents following PCU involvement.



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Reducing Risk Factors

Relative caregivers, unless they decide to become licensed, are not required to attend any formal training. Engagement with relatives regarding safety planning and appropriate care and discipline is of the utmost importance when a placement is made, particularly given the increasing needs of youth in care. As such, MDHHS will explore training options for relative caregivers.

There are common characteristics of children and caregivers and specific factors that are strongly related to an increased likelihood of maltreatment and/or inadequate care of a child in foster care. The following characteristics and factors will be considered when providing and identifying supports:

| Common Characteristics for the Child | Common Characteristics for the Caregiver |
|--|---|
| <ul style="list-style-type: none"> • Multiple prior placements. • Behavior concerns. • Emotional health needs. • Prior runaway attempts. • Age five or younger at time of placement. • Involvement with the juvenile court system. | <ul style="list-style-type: none"> • Multiple children placed in the home. • Prior criminal convictions. • History of domestic violence. • History of perpetrated child maltreatment. • History of having a corrective action plan. • Mental health diagnosis and/or treatment. |

Factors contributing to potential instances of maltreatment include:

- Difficulties related to caring for a child because of the child's needs (e.g., behavioral issues, mental health issues, special needs, etc.).
- Decisions about how to supervise, who can supervise, or time needed to supervise children in care (sometimes related to employment or multiple children in the home).
- The presence of other adults in the home (renters, significant others, and relatives).
- Incidents or conflicts between children in the home.
- Alcohol use and substance abuse (by caregiver or other adults).
- Domestic violence.



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- Concerns about the living conditions of the home.
- Lack of understanding related to parenting time (situations when parenting time should not occur) and what “supervised” visitation entails.
- Financial concerns due to additional household members.
- Engagement of services and follow-up.

Statewide MIC Remediation Plan:

MDHHS has identified the following program areas for oversight of the Statewide MIC Remediation Plan: Children’s Services Administration (CSA), Maltreatment in Care (MIC), and Division of Child Welfare Licensing (DCWL).

Children’s Services Administration (CSA) Remediation Efforts:

| Action Steps | Oversight | Status | Due/Completion Date(s) |
|--|----------------|---------------------------------|------------------------|
| 1. The CSA will initiate a workgroup to establish an approach to MIC prevention and remediation strategies. | CSA Leadership | Completed | |
| a) Workgroup members will meet with staff from the State of Oklahoma, which is also under court oversight. Oklahoma has been able to reduce their MIC rate while significantly utilizing relative placements. | DCQI | Completed | |
| b) The workgroup will review multiple MIC remediation efforts, resources, and strategies used by Oklahoma. | DCQI | Pending | |
| c) The workgroup will request Division of Continuous Quality Improvement (DCQI) division managers access to Oklahoma’s online MIC training. | DCQI | Pending | |
| d) Workgroup participants will provide feedback on suggested actions to establish a prevention approach to MIC. | DCQI | Ongoing | |
| 2. The CPS-MIC will regularly review processes, and make adjustments where needed. | CPS-MIC | Ongoing | |
| a) CPS-MIC and the Division of Child Welfare Licensing (DCWL) will create a qualitative case read tool focusing on areas of deficiency in MIC investigations identified in the first round of Michigan Monitoring Team | CPS-MIC, DCWL | Completed Jan. 2022 and Ongoing | |



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| Action Steps | Oversight | Status | Due/Completion Date(s) |
|--|----------------|----------------------------------|------------------------|
| (MMT) case reviews. The questions will focus specifically on areas that MMT and CPS-MIC leadership found deficient in the first set of investigative reviews. CPS-MIC staff will complete the review tool prior to case approval so that case expectations can be met prior to the case being finalized. The review tool will be routinely updated to include any newly identified areas of deficiency or opportunities for improvement. | | | |
| b) Second line supervision reviews will be implemented and will occur for all confirmed CPS-MIC Child Caring Institutions (CCI) investigations. Second line reviews of cases that are not confirmed remains a standing practice. | CPS-MIC | Completed May 2024 and Ongoing | |
| c) All CPS-MIC staff will be retrained on maltreatment type definitions. | CPS-MIC | Completed June 2024 | |
| d) Continuous efforts will be made to ensure case activities are clearly documented and all safety concerns are addressed and documented in CPS-MIC reports. | CPS-MIC | Ongoing | |
| i. CPS-MIC will implement a uniform disposition format to utilize for investigation summaries. This format explains how statutory elements are met when making a finding or how they were not met when a case is not confirmed. | CPS-MIC | Completed Sept. 2023 and Ongoing | |
| ii. CPS-MIC will develop a disposition writing training to help case managers with analysis writing to ensure readers understand how CPS-MIC determined a disposition. | CPS-MIC | Ongoing | |
| iii. CPS-MIC will complete detailed safety assessments for all CPS-MIC investigations outlining all safety factors and the established safety plan. Safety plans will be sent to assigned case managers for awareness of required actions steps related to child safety. These assessments will be reviewed during second line reviews as well as during quality reviews completed by DCQI. | CPS-MIC | Ongoing | |
| 3. CSA will enhance supports to CCIs. | CSA Leadership | Ongoing | |



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| Action Steps | Oversight | Status | Due/Completion Date(s) |
|---|------------------------|-----------|------------------------|
| a) Restructure the technical assistance process to regularly assess the need for increased or decreased engagement with CCIs. | DCWL | Pending | |
| b) Create a standardized referral process for CCIs to receive preventative technical assistance. | DCWL | Pending | |
| c) Enhance supports to CCIs based on feedback from a Lean Process Improvement (LPI). | DCWL | Pending | |
| d) Revise CCI rules. | DCWL | Pending | |
| 4. CSA will gather data to analyze the relationship to, and identify trends for, denied or rejected complaints about providers who are subsequently confirmed for abuse or neglect. | DCQI | Ongoing | |
| a) Discussions will be held regarding Placement Collaboration Unit engagement and how modifying their engagement with providers at the time of a rejected or denied complaint may offer an enhanced prevention effort. These discussions will include enhancements/modifications to the Kinship Support Worker role. | PCU | Pending | |
| b) Discuss the analysis of recent events during monthly meetings between the MIC unit and Business Service Center (BSC) directors. | CPS-MIC, BSC Directors | Ongoing | |
| c) The CPS-MIC unit will distribute a weekly list containing all confirmed MIC cases to each BSC and county director for follow up and to ensure services and appropriate case management action steps were taken. | CPS-MIC | Ongoing | |
| d) The CPS-MIC unit will send a written summary to each county and BSC director outlining the safety factors and protecting interventions discussed during the pre-disposition case conference, when there is a confirmed MIC event, and a change of placement has not or will not occur. BSC and county directors will ensure appropriate action steps are taken to ensure ongoing child safety. | CPS-MIC | Ongoing | |
| 5. In January 2024, Communication Issuance 24-006: Relative Safety - Maltreatment in Care was sent to all central office, county, agency staff, and | CSA | Completed | |



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|---|-----------|-----------------------|------------------------|
| tribal governments noting the increase in MIC in relative homes and introducing two resources to support staff and relative caregivers: | | | |
| a) The Child Welfare Case Manager - Relative Tip Sheet, which provides ways to support relative caregivers and contains information on common trends surrounding relative MIC events. | CSA | Completed | |
| b) The Relative Caregiver Tip Sheet, which is a best practice tool provided to all relative providers and includes an overview of expectations, potential supports, and space to document contact information for staff involved with the case. | CSA | Completed | |
| 6. In June 2024, a Sustaining Performance Improvement Child Placing Agency (SPI-CPA) meeting was held to provide status updates on MIC and included breakout groups for county and agency leadership to discuss root causes of MIC. | DCQI | Completed | |
| a) The feedback from the breakout sessions will be compiled and provided to the workgroup and shared with appropriate staff. | DCQI | Pending | |
| b) The University of Michigan (UM) MIC Report, which included an assessment of data produced by the UM Data Lab, was provided to participants of SPI-CPA for additional information surrounding MIC. | DCQI | Completed | |
| c) The University of Michigan will develop an updated report to determine trends with PCU-involved cases and predictive factors for MIC events to help guide the state's prevention work. | DCQI | Pending | |
| 7. The MIC Quality Assurance (QA) tool will be updated to enhance root cause analyses by DCQI analysts. | DCQI | Pending | |
| 8. MISEP MIC meetings will be initiated to provide detailed MIC data to BSCs to assist in driving strategy development for remediation and prevention of MIC. | DCQI | Completed and Ongoing | |
| a) The data sets will provide multiple details about confirmed MIC incidents including details on the supervising county and private agency (where applicable) of the case, the living arrangement when the MIC incident occurred, the perpetrator(s), maltreatment types, category, if placement was ordered against MDHHS' recommendation, if the youth experienced | DCQI | Ongoing | |



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| more than one MIC event, and how many MIC incidents are occurring per month. | | | |
| b) These data sets will continue to be analyzed to look for current trends for relative placements. | DCQI | Ongoing | |
| i. The analysis of MIC incidents will be specific to time in placement prior to MIC (when the risk is highest), age and race of MIC victims, number of other children in the placement, perpetrator role, and maltreatment types. | DCQI | Ongoing | |
| ii. The trends will be reviewed against trends from the July 2021 to June 2023 timeframe to assess if trends remain similar in relative MIC events. | DCQI | Ongoing | |
| c) BSCs and counties will utilize the data to understand trends and focus efforts to reduce and prevent MIC. At subsequent meetings, the BSCs are expected to report out on progress. | BSC Directors | Ongoing | |
| 9. BSCs will review MIC incidents to determine root causes which will then drive specific strategies and services for implementation. | BSC Directors | Ongoing | |

Maltreatment in Care Remediation Efforts:

| Action Steps | Oversight | Status |
|--|--------------------------------------|---------|
| 1. CPS-MIC will hold an exit conference with facility administration at the conclusion of CCI investigations, to discuss strengths as well as areas for enhancing safety that were noted during the investigation. Feedback on safety planning, strategies for addressing issues, and general guidance are provided during these meetings. | CPS-MIC | Ongoing |
| 2. Weekly CCI Status Update meetings will be held with staff from the CPS-MIC unit, Division of Child Welfare Licensing (DCWL), Residential Collaboration and Technical Assistance Unit (RCTAU), and CSA leadership to discuss facilities with the highest risk stratification scores. Updates are provided on pending CPS-MIC investigations, DCWL special investigations and Corrective Action Plans (CAPs), RCTAU engagement plans, along with areas of strengths and identified supports needed for targeted CCIs. | CPS-MIC, DCWL, RCTAU, CSA Leadership | Ongoing |



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| 3. A Predisposition Case Conference will be held with CPS-MIC staff and all active case managers and their supervisors at the conclusion of each CPS-MIC investigation for all placement types. At the dispositional conference, the CPS-MIC manager will discuss a final safety plan with foster care, foster home licensing and/or DCWL case managers to ensure all needs of the family and/or child are addressed. If there are gaps identified in service provisions for the child/family, a plan to address those needs will be developed. | CPS-MIC | Ongoing |

Division of Child Welfare Licensing Remediation Efforts:

| Action Steps | Oversight | Status |
|---|-----------|---------|
| 1. A CCI exit conference will be held with facility administration at the conclusion of a DCWL investigation and/or inspection to discuss strengths and provide technical assistance and consultation. | DCWL | Ongoing |
| 2. The DCWL will conduct unannounced quarterly visits to CCIs, assessing the functioning of the agency and providing technical assistance and consultation. | DCWL | Ongoing |
| 3. The DCWL will revamp their CCI orientation, enhancing it to include common licensing rule violations, required training expectations for staff, and guidelines to support the health of the agency. | DCWL | Ongoing |
| 4. The Building Bridges Initiative will be available to state facilities as well as contracted shelters. | DCWL | Ongoing |
| 5. CPS background checks will be assessed by an administrative review team to determine eligibility to hire, thereby preventing staff from moving from one facility to another after being confirmed for child abuse and/or neglect without a review and assessment of their history. | DCWL | Ongoing |
| 6. During the six-month original licensing period, or the first six months following resumption of services, DCWL will provide monthly on-site visits to provide consultation and technical assistance regarding implementation of policies and procedures, supervisory oversight, and hiring and training processes. Youth and staff interviews are conducted to assess the program's functioning and spot checks of files are completed to ensure required documentation is being maintained. | DCWL | Ongoing |



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|--|-----------|----------------|
| 7. Corrective action plan follow-up will be conducted to ensure facilities adhere to their commitment to improve practices, update policies, train staff, etc. | DCWL | Ongoing |
| 8. The DCWL will utilize this remediation plan to enhance the partnership and collaboration between the CCIs and local office staff to ensure youth are receiving the supports needed during their placement, as well as planning for their discharge at the onset of placement. | DCWL | In Development |